

EXHIBIT 8

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION,

Court File No. 16-cv-1054 (WMW/DTS)

Plaintiff,

v.

**DEFENDANTS'
EIGHTH SUPPLEMENTAL
ANSWER TO PLAINTIFF'S
INTERROGATORY NO. 17**

FEDERAL INSURANCE COMPANY,
an Indiana corporation, and ACE
AMERICAN INSURANCE COMPANY, a
Pennsylvania corporation,

Defendants.

To: Plaintiff and its attorneys, Allen Hinderaker, Heather Kliebenstein, Michael A. Erbele, and Joseph W. Dubis, Merchant & Gould P.C., 3200 IDS Center, 80 South Eighth Street, Minneapolis, MN 55402.

Defendants Federal Insurance Company and ACE American Insurance Company ("Federal"), for their Eighth Supplemental Answer to Plaintiff's Interrogatory No. 17, state and allege as follows:

GENERAL RESPONSES

1. Federal objects to the Definitions and Instructions to the extent that they seek to impose obligations on Federal that either exceed, or are different from, what is required under the Federal Rules of Civil Procedure, District of Minnesota Local Rules, and the Stipulated E-Discovery Order.

2. Federal objects to the requests to the extent that they seek information protected from discovery under the attorney-client privilege or work product doctrine.

3. Federal's responses and objections are made to the best of Federal's present knowledge, information, and belief. Federal's responses and objections are limited to information within its possession, custody, or control. Federal reserves the right to amend, supplement, or

change any responses and objections if and when additional, different, or more accurate information becomes available and/or facts are developed.

4. Federal gives these Responses subject to all objections to admissibility that may be interposed in this proceeding.

EIGHTH SUPPLEMENTAL ANSWER TO INTERROGATORY NO. 17

INTERROGATORY NO. 17: For all insurance policies in connection with which the Blaze Advisor software was used, the gross written premium of Defendants and the gross written premium of each related company, including the specific identification of each related company, for each quarter from March 30, 2016 to date. For clarity, this Interrogatory is not seeking investment income, other income, or capital and surplus accounts.

SUPPLEMENTAL ANSWER: Federal objects to the request for “all” insurance policies as overbroad, unduly burdensome, and not proportional to the needs of this case. Federal also objects to this Interrogatory as compound and impermissibly constituting multiple interrogatories, which are limited in number under the Federal Rules. Federal also objects to this Interrogatory as vague and ambiguous in failing to identify the relevant “use” and calling for insurance policies “in connection with.” Federal further objects to this Interrogatory because “the gross written premium” of Defendants and the “gross written premium of each related company” are not relevant to any claim or defense in this action, including because FICO has not presented any evidence of a non-speculative connection between Federal’s profits and the alleged infringement, as is necessary for FICO to obtain an award of the defendants’ profits under 17 U.S.C. § 504(b). (*See, e.g.*, Dkt. 380 at 6-8; Dkt. 445 at 28-34; Dkt. 567 at 5-7.) Federal further objects to the extent the Interrogatory seeks information not in the possession, custody, or control of Federal, and thus exceeds the scope of discovery under Federal Rule 26(b)(1).

Subject to, and without waiving these objections, Federal states the following:

- For the Financial Lines Unit (post-merger) for the years identified below, the following applications used Blaze Advisor® software: CSI Express, Decision Point, Automated Renewal Process, Profitability Indicator, and Defined Book Run. The approximate gross

- For Corporate Business Systems (CBS), which is not a strategic business unit (SBU), the following application uses Blaze Advisor software: Premium Booking. The approximate gross written premiums and policy counts that used these applications, in connection with which the Blaze Advisor software was used, is provided in the charts below for the years requested. Discovery is continuing.

Year	Gross Written Premium	Policy Count
2019	\$426,769,796.93	344,101
2018	\$500,850,828.90	57,023
2017	\$442,839,931.87	60,142
2016	\$503,432,073.43	57,219

- The data for Premium Booking is extracted from a mainframe DB2 table that is specifically tracking the policies that passed through the Premium Booking “rules” as constructed in/using the Blaze Advisor tool. This table does not include writing company and that information could not be correlated to the policy count/gross written premium values being provided.
- The Blaze Advisor component was removed from the version of Premium Booking used by Corporate Business Systems on or about April 17, 2020.
- For the Chubb Commercial Insurance (CCI) business unit for the years identified below (post-merger), the following applications use Blaze Advisor software: CUW-IM, TAPS, and IRMA. The approximate gross written premiums, policy counts, and identification of the insurance writing companies that issued insurance policies that used these applications, in connection with which the Blaze Advisor software was used, is provided in the charts below for the years requested. Discovery is continuing.

- For CUW-IM:**¹

YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
2016	CHUBB CUSTOM INSURANCE COMPANY	2,139	\$217,444,131.89
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	8	\$41,810.83
	CHUBB EUROPEAN GROUP SE	44	\$260,360.32
	CHUBB INDEMNITY INSURANCE COMPANY	4,550	\$515,778,122.21
	CHUBB INSURANCE AUSTRALIA LIMITED	6	\$223,981.75
	CHUBB INSURANCE COMPANY LIMITED	4	\$10,686.35
	CHUBB INSURANCE COMPANY OF CANADA	6	\$173,352.78
	CHUBB INSURANCE COMPANY OF NEW JERSEY	3,792	\$69,278,561.62
	CHUBB NATIONAL INSURANCE COMPANY	1,268	\$50,975,438.23
	CHUBB SEGUROS BRASIL, S.A.	2	\$4,281.03

¹ We understand that this financial information includes policies that were brought in under a system that includes policies that are renewed using Blaze, but automatically at the same time includes the prior transaction involving the same policy regardless whether it uses Blaze. We are seeking a way to not include the prior policy since it results in the financial information having inflated numbers. Discovery is continuing.

YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
	EXECUTIVE RISK INDEMNITY INC.	13	\$2,167,006.00
	EXECUTIVE RISK SPECIALTY INSURANCE COMPANY	29	\$4,528,627.00
	FEDERAL INSURANCE COMPANY	146,689	\$4,800,545,165.18
	GREAT NORTHERN INSURANCE COMPANY	31,416	\$868,809,231.66
	PACIFIC INDEMNITY COMPANY	4,692	\$426,214,814.73
	VIGILANT INSURANCE COMPANY	6,647	\$307,080,046.78
	ACE AMERICAN INSURANCE CO	2,890	\$108,983,073.98
	ACE FIRE UNDERWRITERS INS	38	\$1,092,991.43
	ACE PROPERTY AND CASUALTY	768	\$106,304,729.88
	ILLINOIS UNION INSURANCE	1,183	\$81,709,115.00
	INDEMNITY INSURANCE CO OF	97	\$17,014,247.06
	PACIFIC EMPLOYERS INSURAN	6	\$469,700.00
	WESTCHESTER SURPLUS LINES	132	\$12,587,416.00
	WFIC FOR BUS.EFF.1/1/11	1,010	\$31,266,954.00
2017	CHUBB CUSTOM INSURANCE COMPANY	1,138	\$125,050,559.99
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	2	\$12,403.95
	CHUBB EUROPEAN GROUP SE	48	\$368,955.05
	CHUBB INDEMNITY INSURANCE COMPANY	6,269	\$581,425,852.84
	CHUBB INSURANCE AUSTRALIA LIMITED	3	\$5,554.56
	CHUBB INSURANCE COMPANY LIMITED	3	\$7,913.26
	CHUBB INSURANCE COMPANY OF CANADA	2	\$14,184.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	3,590	\$65,809,698.12
	CHUBB NATIONAL INSURANCE COMPANY	1,970	\$68,554,767.36
	CHUBB SEGUROS BRASIL, S.A.	2	\$16,297.71
	EXECUTIVE RISK INDEMNITY INC.	12	\$2,732,882.00
	EXECUTIVE RISK SPECIALTY INSURANCE COMPANY	11	\$1,102,030.00
	FEDERAL INSURANCE COMPANY	155,496	\$5,098,833,242.24
	GREAT NORTHERN INSURANCE COMPANY	32,597	\$912,720,319.57
	PACIFIC INDEMNITY COMPANY	4,930	\$468,474,693.69
	VIGILANT INSURANCE COMPANY	6,629	\$324,338,205.42
	ACE AMERICAN INSURANCE CO	8,243	\$354,885,926.81
	ACE FIRE UNDERWRITERS INS	53	\$1,722,590.00
	ACE PROPERTY AND CASUALTY	2,413	\$248,919,844.00
	ILLINOIS UNION INSURANCE	3,444	\$255,341,641.00
	INDEMNITY INSURANCE CO OF	281	\$21,351,439.00
	PACIFIC EMPLOYERS INSURAN	21	\$869,381.00
	WESTCHESTER SURPLUS LINES	476	\$45,285,709.00
	WFIC FOR BUS.EFF.1/1/11	2,246	\$67,191,783.00
2018	CHUBB CUSTOM INSURANCE COMPANY	731	\$68,563,377.16
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	3	\$16,435.05
	CHUBB EUROPEAN GROUP SE	26	\$85,623.53
	CHUBB INDEMNITY INSURANCE COMPANY	6,400	\$443,033,892.97
	CHUBB INSURANCE AUSTRALIA LIMITED	1	\$25,208.13
	CHUBB INSURANCE COMPANY LIMITED	1	\$6,135.53

YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
	CHUBB INSURANCE COMPANY OF CANADA	1	\$6,754.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	3,420	\$32,946,513.21
	CHUBB NATIONAL INSURANCE COMPANY	2,027	\$66,309,955.84
	CHUBB SEGUROS BRASIL, S.A.	2	\$642.52
	EXECUTIVE RISK INDEMNITY INC.	8	\$1,661,561.00
	EXECUTIVE RISK SPECIALTY INSURANCE COMPANY	3	\$213,165.00
	FEDERAL INSURANCE COMPANY	145,259	\$3,559,391,727.53
	GREAT NORTHERN INSURANCE COMPANY	31,212	\$710,269,799.52
	PACIFIC INDEMNITY COMPANY	4,488	\$369,995,206.40
	VIGILANT INSURANCE COMPANY	5,996	\$227,639,141.37
	ACE AMERICAN INSURANCE CO	6,740	\$274,751,661.00
	ACE FIRE UNDERWRITERS INS	38	\$1,498,240.00
	ACE PROPERTY AND CASUALTY	1,971	\$191,070,156.00
	ILLINOIS UNION INSURANCE	3,372	\$240,820,970.00
	INDEMNITY INSURANCE CO OF	175	\$13,196,308.00
	PACIFIC EMPLOYERS INSURAN	14	\$51,084.00
	WESTCHESTER SURPLUS LINES	602	\$49,388,448.00
	WFIC FOR BUS.EFF.1/1/11	1,273	\$36,242,321.00
2019	CHUBB CUSTOM INSURANCE COMPANY	738	\$79,478,653.69
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	1	\$16,466.22
	CHUBB EUROPEAN GROUP SE	16	\$83,822.36
	CHUBB INDEMNITY INSURANCE COMPANY	6,105	\$33,298,798.98
	CHUBB INSURANCE AUSTRALIA LIMITED	1	\$24,383.48
	CHUBB INSURANCE COMPANY LIMITED	1	\$6,005.01
	CHUBB INSURANCE COMPANY OF CANADA	1	\$4,458.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	2,440	\$44,839,600.86
	CHUBB NATIONAL INSURANCE COMPANY	2,020	\$88,253,078.49
	CHUBB SEGUROS BRASIL, S.A.	1	\$607.07
	EXECUTIVE RISK INDEMNITY INC.	10	\$2,339,425.00
	EXECUTIVE RISK SPECIALTY INSURANCE COMPANY	3	\$251,939.00
	FEDERAL INSURANCE COMPANY	120,613	\$4,351,674,029.57
	GREAT NORTHERN INSURANCE COMPANY	31,409	\$917,988,714.52
	PACIFIC INDEMNITY COMPANY	4,532	\$446,973,851.17
	VIGILANT INSURANCE COMPANY	5,929	\$296,287,341.22
	ACE AMERICAN INSURANCE CO	10,025	\$421,279,223.00
	ACE FIRE UNDERWRITERS INS	58	\$1,963,803.00
	ACE PROPERTY AND CASUALTY	2,787	\$337,956,699.00
	ILLINOIS UNION INSURANCE	4,560	\$421,234,166.00
	INDEMNITY INSURANCE CO OF	340	\$27,030,784.00
	PACIFIC EMPLOYERS INSURAN	32	\$736,532.00
	WESTCHESTER SURPLUS LINES	879	\$93,856,583.00
	WFIC FOR BUS.EFF.1/1/11	2,587	\$107,190,473.00

- The Blaze Advisor component was removed from the version of CUW-IM used by the Chubb Commercial Insurance (CCI) business unit in early November 2019.

Dated: June 15, 2020

/s/ Terrence J. Fleming

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VERIFICATION

Malcolm Irving states under oath that he is in Financial Lines IT; that he is authorized to respond to Plaintiff's Interrogatory No. 17 on behalf of Federal Insurance Company as it relates to the Financial Lines Unit; that he has relied on directors, employees, agents, and attorneys to provide information used in formulating the answer to the above interrogatory; and that the answer is true and correct to the best of his knowledge.

Malcolm Irving

Subscribed and sworn to before me
this _____ day of June, 2020.

Notary Public

VERIFICATION

C. Chase McCarthy states under oath that he is IT Lead, North America Commercial Middle Market/Chief Architect, Personal Risk Services; that he is authorized to respond to Plaintiff's Interrogatory No. 17 on behalf of Federal Insurance Company as it relates to the Chubb Commercial Insurance (CCI) business unit; that he has relied on directors, employees, agents, and attorneys to provide information used in formulating the answer to the above interrogatory; and that the answer is true and correct to the best of his knowledge.

C. Chase McCarthy

Subscribed and sworn to before me
this _____ day of June, 2020.

Notary Public

VERIFICATION

Tracie D. Jerd states under oath that she is the Program Manager for Enterprise Content Management, WorkflowBPM and Sunset Applications for Chubb North America; that she is authorized to respond to Plaintiff's Interrogatory No. 17 on behalf of Federal Insurance Company as it relates to Premium Booking and Cornerstone; that she has relied on directors, employees, agents, and attorneys to provide information used in formulating the answer to the above interrogatory; and that the answer is true and correct to the best of her knowledge.

Tracie D. Jerd

Subscribed and sworn to before me
this ____ day of June, 2020.

Notary Public